

EXHIBIT M

Mike Matesky

From: Kelly Mennemeier <kelly.mennemeier@foster.com>
Sent: Monday, April 13, 2020 4:19 PM
To: 'Michael Galletch'; 'Mike Matesky'
Cc: Ben Hodges; Anne Cohen; Sheeba Roberts; Nancy Stephens; Sean M. Bettis
Subject: ULC v. AMM -- follow up on meet and confer and upcoming depositions
Attachments: 4-13-20 - AMM Obj to Plf Amended FRCP 30b6 NOD.PDF

Mike,

This email is in follow up to our meet and confer this morning.

First, we spoke about ULC's proposal that one attorney per firm be permitted to question a witness, and AMM's objection to that proposal. AMM previously provided ULC with a local rule and case law supporting our position that only one attorney per party is permit to examine a testifying witness. You took the position that you didn't think that law applied to depositions. We nonetheless agreed that in the case of the 30(b)(6) depositions in this case, it would be permissible for one attorney for a party to question one 30(b)(6) designee and another attorney for the same party to question another 30(b)(6) designee, in the event that there is more than one 30(b)(6) designee for a party.

We also touched upon the fact that AMM has raised a number of objections to the identified topics, and that the objections in some cases were of such a nature that AMM was unable to designate a witness. You argued that the onus was on AMM to move for a protective order on these issues, but the parties have not yet conferred on these issues. As we've previously communicated and reiterate now, we would like to hold a meet and confer as soon as possible about these objections, as we cannot seek the court's intervention until the parties have conferred. You indicated that you were not prepared to address AMM's objections this morning, but we ask that you please let us know the soonest you are available to confer. I have attached to this email our reissued objections and designations to your amended notice of deposition.

We also spoke about who would bear the cost of the connection fee for the attendees. AMM identified several court reporting services that its counsel has been in contact with who provide videoconferencing services free of charge. I understand, however, that ULC plans to proceed with TSG, over AMM's objection to the per-attendee cost. You asked that we provide a list of deposition attendees and the list is as follows: Glen Yoshioka (glen@theamm.com), Lewis King (lewis@theamm.com), Ben Hodges, Kelly Mennemeier, Anne Cohen (Tuesday), and Sheeba Roberts (Wednesday). With the exception of Anne and Sheeba, everyone plans to attend both days. At this point, AMM and the individual defendants have not agreed to bear any of the costs of having their counsel attend.

We agreed that we would work to schedule a time later in the week to confer about various other outstanding discovery issues – likely Thursday or Friday. Please let us know times that would work for such a call.

As a final matter, I wanted to let you know that the supplemental production that we'd previously indicated was in the works should be finalized and sent to you today. This production will include, as promised, documentation of AMM's number of ordained ministers. If you decide that you'd like to postpone the 30(b)(6) depositions in order to have a greater opportunity to review the supplemental production, we are willing to accommodate that, but we are prepared to complete these depositions as currently scheduled if you would prefer to go forward.

Best,
Kelly

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